

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

No. 2:21-cv-00693-JHC

Plaintiffs,

STIPULATED MOTION AND
ORDER REGARDING SEALING
OF SUPPLEMENTAL MOTION TO
COMPEL BRIEFING

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

DEBORAH FRAME-WILSON, *et al.*, on behalf of themselves and all other similarly situated,

Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation.

Defendant

No. 2:22-cv-00965-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated.

Plaintiffs.

V

AMAZON.COM, INC., a Delaware corporation

Defendant

STIP. MOT. & ORDER
RE SEALING OF SUPP.
(No. 2-21-cv-00693)

1 The Parties have met and conferred with respect to the upcoming supplemental briefing
2 on Plaintiffs' Motion to Compel, and anticipate that their briefs, declarations, and exhibits will
3 quote from and/or describe in detail a significant amount of information that has been designated
4 as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order
5 to ensure that such materials are treated appropriately under the applicable protective order, and
6 to reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their
7 respective counsel, hereby stipulate and agree to the following procedure for filing and sealing in
8 connection with the supplemental motion to compel briefing, subject to the Court's approval.

9 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its
10 supplemental brief, declarations, exhibits, and all other evidence and declarations on which that
11 Party relies (collectively, “Supplemental Papers”) which contain material designated
12 Confidential or Highly Confidential-Attorneys’ Eyes Only by Amazon.

13 2. Within two weeks of the filing of the Parties' Supplemental Papers, pursuant to
14 LCR 5(g), the Parties will meet and confer and, as appropriate, file (1) public versions of their
15 Supplemental Papers, with necessary redactions, and (2) corresponding motion(s) to seal
16 pursuant to LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction)
17 shall be the movant for purposes of any such motion(s) to seal associated with the Parties'
18 Supplemental Papers.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

1 DATED December 9, 2024.

Respectfully submitted,

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24 STIP. MOT. & ORDER

25 RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING - 3

26 (No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)

1 IT IS SO ORDERED.
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3

4 December 9, 2024

5 Dated

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8 John H. Chun
9 United States District Judge

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STIP. MOT. & ORDER

RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING - 4

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)